

Agency Docket number 05-015-1

Docket ID APHIS-2005-0044

Title National Animal Identification System; Notice of Availability. . .

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Thank you for the opportunity to comment on the Draft Strategic Plan for the National Animal Identification System (NAIS). These comments based on a career in veterinary medicine, encompassing 17 years as a practitioner having valuable auction market experience and nearly 20 years as a federal and state animal health official.

My comments will be brief.

Mandatory vs. voluntary. I believe the general consensus of producers and industry today is that the animal identification system must become mandatory to achieve the NAIS goals. However, producers are fearful of just what is meant by, “mandatory”. That term could mean anything from mandatory tagging of breeding age animal and tracking their life through change of ownership transactions to mandatory tagging of all animals in a species group and tracking their every move to a different location. There is a vast difference in these two denominators and the industry needs to understand the governments plan before they can willingly support it.

Key stakeholder concerns are identified but it is not clear how or when these issues will be addressed. To give producers confidence that NAIS will be a system that they can work with issues such as confidentiality and how data will be collected and where it will be stored must be attended to and placed into federal law before states begin developing their respective rules and regulations. Promises and good intentions will not satisfy those who are skeptical of NAIS. USDA has received input from producers, allied industry groups, and state and federal agencies. USDA is now urged to aggressively take a stronger position and continue to provide the leadership necessary to implement a plan that can achieve the goals without being overly burdensome to the industry.

Timeline. A timeline for accomplishments is a necessary component of any plan. However, a timeline for a voluntary system is only a guideline at best. Without mandates there is no authority to enforce deadlines. If a state lags behind and does not meet the voluntary timeline goals, what will be the recourse? Since much of the responsibility of implementing NAIS and enforcing the subsequent mandates falls to the state animal regulatory agency, the national timeline for regulatory or mandated compliance of NAIS should be founded on the actual passage of federal law, not on the intent of proposing legislation. National rules are necessary to give states support and direction and models which can be sculpted into state law.

In addition, a timeline is also needed for proposing federal rules. This will not only give the state rulemaking authorities a schedule from which to work, but it also informs the public and producers what is actually being planned for their industries. Furthermore it establishes a structure which will encourage uniform implementation of NAIS across state lines.

The consequence of prolonging this process is apparent. Allied industry groups, in attempt to be first out of the box, are developing independent ID and tracking systems and databases. We can only hope these developments will enhance rather than complicate the implementation of NAIS.

Transparency. Transparency is extremely important in the successful implementation of NAIS. Although, the Draft document may be an attempt to be more transparent and open about the plan, there are many issues which are not addressed or at least not clear enough that producers know what to expect from USDA in the implementation of NAIS. Until USDA makes decisions addressing concerns raised by interested parties, there will be skeptics of the plan. And rightfully so.

Thank you again for this opportunity to express my concerns. USDA, APHIS, VS has made progressive strides in the development of the Strategic Plan and Program Standards and is commended. For the reasons stated above, I encourage a more aggressive application of the timeline beginning with USDA, APHIS, VS making firm decisions regarding issues of concern and establishing a schedule for proposed federal legislation which addresses those issues. Subsequent follow-through should be passage of federal legislation which will provide states the support and background needed for the state's rulemaking process which will become the starting point for the NAIS implementation timeline.